

TO: 1. Executive Director of Milwaukee Elections Paulina Gutierrez
2. City of Milwaukee Board of Elections (“MEC”)
3. Terrell Martin - Commissioner
4. Patricia Ruiz-Cantú - Commissioner
5. Douglas Haag - Commissioner

March 26, 2025

City Hall, Room 501 200 E. Wells Street Milwaukee, WI 53202

Re: submitting legal challenge to voter registrations in the City of Milwaukee

A We are submitting these **4,878 notices** under federal HAVA, Wis Stats 6.36(1)(a), and several other state statutes cited further below. For example, per statute 6.50(3), no sworn affidavit is needed; also per 7.15(1)(g).

B Our TITAN system screens voter registrations for various issues. On February 20, 2025 a new statewide voter registration list was purchased from WEC’s Badger Voter website. We ran it through our TITAN system which compares it against the US Postal Services main database and also its National Change of Address database. Wis Stats 6.48 et al.

C We found many issues, irregularities and also voter fraud. Each name and address were submitted through the USPS CASS® (Coding Accuracy Support System) evaluation system. The USPS CASS® evaluation is run against several progressively deeper-leveled databases, such as: state, city, zipcode-5-digit, a check on those 3 columns together, then a check against the street name with in them, then a street number range check, then a check against the actual street number in the “Zip_4” database, and then a check on apt_unit at that specific building, then a check if that address is unoccupied, and then other specialty checks. It returns many columns, each with detailed codes describing one or more problems with each address on this list.

D More on CASS: (Coding Accuracy Support System) Certification is a program that was developed by the USPS to test the accuracy of address-matching software and improve the accuracy of postal coding, such as ZIP+4 Code®, carrier route and 5-digit ZIP Code coding. <https://postalpro.usps.com> › CASS › CASSTECH_N The bottom line is that the USPS has declared that all of the items in this report cannot be mailed without mailing address correction(s).

E Two (2) recent State Supreme Court cases reinforced that municipal clerks in Wisconsin are required to keep the voter registration list clean. See *State v. Wisconsin Elections Commission*, 957 NW 2d 208 - Wis: Supreme Court 2021; and *Teigen v. WISCONSIN ELECTIONS COM'N*, 976 NW 2d 519 - Wis: Supreme Court 2022.

F The attached spreadsheet contains eight individual worksheets (tabs along the bottom), each containing a separate issue. Pursuant to Wis Stat 5.061(1), 6.27, 6.32(1),(2), 6.325, 6.33(1),(2), 6.36(1)(a), 6.50, 6.50(3), 7.15(1), 7.15(1)(g) and the federal HAVA act, we are formally challenging each registration in the city of Milwaukee's municipality and ask for each of the noted problems and irregularities be resolved. Specifically, to a) refer for prosecution those who registered unlawfully – such as to a UPS store, b) send out postcards, c) turn the registrant to Inactive status. We also are hereby providing notice to this Commission and the Executive Director of these problems under statute 6.50(3). Our findings and thus challenges and putting you all on notice:

All of these registrants voted in the November 5th 2025 National election.

- 1 Commercial Addresses, typically UPS or Fedex stores: **24**
- 2 Secondary Address missing or incorrect, i.e. wrong APT number **2,926**
(lacks proper legal chain of custody, reg. with an incorrect or incomplete address, see 6.33 et al)
- 3 N or Blank **540** (registrant no longer at that address)
- 4 Registered to a US Post Office physical address **11**
- 5 Moved before 10-24-2024, left no forwarding address **217**
- 6 Moved before 10-24-2024 signed a permanent NCOA out of state **377**
- 7 Moved before 10-24-2024 signed a permanent NCOA out of the county
to a new county within Wisconsin **281**
- 8 Physical address now a P.O Box **501** (originally used a real physical address, but now primary address is a PO Box)

Grand Total: 4,878 (each cast a ballot in Nov 5th election)

G We would like to draw your attention to an important note. The US Postal Service's National Change of Address, to which we have a subscription and access to their national database, was set to flag only the movers who checked the "permanent" box on the voter's form they filed with the federal government. Please contact us if you need clarification on any of the registration data on the spreadsheet. It has 8 tabs along the bottom, one for each type of issue being challenged.

Respectfully, Dated: March 26, 2025

Justin Gavery

Electronically Signed By: *Justin Gavery*

730 North Plankington Ave 7D Milwaukee, WI 53203

justin_gavery@yahoo.com, 408-858-4527

Joe Nolan

Electronically Signed By: *Joe Nolan*

2909 South 52nd Street, Milwaukee, WI 53219

414-639-0736, secure.jnolan@protonmail.com